

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

05 CR 10027 MLW

UNITED STATES OF AMERICA

V.

1. LEO J. CAMBRIA, JR.
2. GINA CAPODILUPO,  
a/k/a "Gina Cambria"
3. DEBRA TAMBURINO,

Defendants

) Criminal Number:

)

) Violation:

)

) 21 U.S.C. § 846 -

) Conspiracy to Possess with

) Intent to Distribute and

) to Distribute

) Methamphetamine and

) Oxycodone

)

)

)

)

GOVERNMENT'S MOTION TO SEAL INDICTMENT

The United States Attorney hereby respectfully moves the Court to seal the ~~superseding~~<sup>9877</sup> indictment in this case until further order of the Court, except to the extent necessary to provide defendants Gina Capodilupo and Debra Tamburino, who have already been arrested, and released, and their counsel, with copies of the indictment. As grounds for this motion, the government states that public disclosure of the indictment might jeopardize the government's ability to arrest one of the defendants.

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

By:

  
RACHEL E. HERSHFANG  
Assistant U.S. Attorney

Dated: Febraury 9, 2005